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January 19, 2023

**VIA ECF**

Hon. Lorna G. Schofield, U.S.D.J.  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, NY 10007

Re: *Velasquez v. Martin Lee, Inc., d/b/a East River Cleaners, and Zaharis Realty, LLC*  
Case No.: 1:22-cv-7116 (LGS)

Dear Judge Schofield:

We represent Defendant Zaharis Realty, LLC (“Defendant”) in the above-referenced matter and submit this letter jointly with Plaintiff. In accordance with Your Honor’s Individual Rules, ¶ 2, please accept this letter as a request to (1) extend Defendant’s time to Answer or otherwise respond to the Complaint from November 7, 2023 through and including March 1, 2023, and (2) adjourn the Initial Conference scheduled for February 8, 2023 to a date of the Court’s choosing following Defendant’s responsive pleading deadline.

The reasons for this request are that Defendant retained counsel today, and a Notice of Appearance was filed today (See ECF Dkt. 30). Moreover, the parties are hopeful a settlement may be reached soon and would prefer to avoid incurring any additional fees associated with the litigation at this time.

Defendant’s original time to Answer was November 7, 2022 based upon the date of service noted by the New York Secretary of State. However, the New York Secretary of State did not forward the Complaint to Defendant by mail until January 4, 2023 and Defendant did not receive the notice of service and Complaint until January 11, 2023.

These two requests will not affect the litigation otherwise as there are no other scheduled deadlines. No prior request for an adjournment or extension has been made.



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We thank the Court for its attention to this matter.

Respectfully yours,

ELLENOFF GROSSMAN & SCHOLE LLP

/S/Lois Traub

Lois Traub

cc: All counsel of Record (via ECF)